

MATTHEW G. McHENRY, OSB# 043571

Levine & McHenry LLC
1050 SW 6th Ave Ste 1414
Portland OR 97204
(503)-546-3927
E-Mail: matthew@levinemchenry.com

AMANDA A. THIBEAULT, OSB #132913

Angeli Law Group
121 SW Morrison St
Suite 400
Portland, OR 97204
(971)-302-6346
E-mail: amanda@angelilaw.com

Attorneys for Defendant Tony Daniel Klein

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiffs,

vs.

TONY DANIEL KLEIN,

Defendants.

Case No. 3:22-cr-00084-SI-1

DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
POST-TRIAL MOTIONS

Defendant, Tony Daniel Klein, hereby moves for a brief extension of the deadline to file post-trial motions, including but not limited to motions for a judgment of acquittal pursuant to Fed. R. Crim. P. 29 and for a new trial pursuant to Fed. R. Crim. P. 33. Defendant respectfully requests that the deadline be extended from August 7, 2023, to end of day August 21, 2023. This motion is made in good faith and not for the purpose of delay.

Undersigned counsel conferred by email with opposing counsel, who indicated that the government does not object to the motion and the August 21, 2023 deadline.

For these reasons, we ask that the Court grant this motion.

DATED this 6 day of August, 2023

Respectfully submitted,

s/ Amanda A. Thibeault
AMANDA A. THIBEAULT, OSB #132913

s/ Matthew McHenry
MATTHEW G. McHENRY, OSB# 043571

Attorneys for Defendant Tony Klein